

COPY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

\* \* \* \* \*

JUSTIN BARKER

VERSUS

NO. 1:21-cv-04419

JUDGE DRELL

MAGISTRATE JUDGE PEREZ-MONTES

LOUISIANA SCHOOL FOR MATH,  
SCIENCE, AND THE ARTS

\* \* \* \* \*

DEPOSITION OF  
DR. KRISTINA POPE KEY  
December 14, 2022

\* \* \* \* \*

Taken At The Law Office Of:

Hudson, Potts & Bernstein  
1800 Hudson Lane, Suite 300  
Monroe, Louisiana 71201

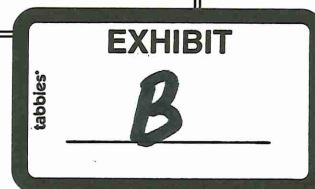
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STATE OF LOUISIANA

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1 the police station.

2 Q When you say downtown, do you have an address or  
3 approximate street name, location?

4 A Downtown Natchitoches.

5 Q Are there multiple police stations, do you know  
6 which area of the strip? I mean, is it Front Street, any  
7 ordinal direction of downtown Natchitoches?

8 A I believe it is two blocks off of Front Street. I  
9 don't know--I don't know the cross street.

10 Q Okay. Who did you speak with at the Natchitoches  
11 Police?

12 A I don't recall.

13 Q What did you tell the Natchitoches Police?

14 A That I had filed an HR grievance against a coworker  
15 and I was concerned because she knew where I lived and I  
16 wasn't sure if I should take any other steps necessary.

17 Q Did you share any additional information with them  
18 concerning the details of what your concerns were?

19 A As I recall, my primary concern was her awareness  
20 of my movements around campus.

21 Q You were concerned that Dr. Barker knew about your  
22 movements around campus?

23 A Yes.

24 Q Can you explain what that means?

25 A It was my experience that Dr. Barker paid careful

1 and close attention to my comings and goings throughout the  
2 day.

3 Q And what is that experience?

4 A What do you mean, what is that experience?

5 Q You said it's been your experience that she notices  
6 your comings and goings throughout the day. I want to know  
7 what your experience is, like give me an example.

8 A Sure. During that--during that season, early 2020,  
9 I experienced that Dr. Barker noted when I was or was not in  
10 my office, when I was or was not moving up and down the  
11 hallways, and she had expressed discomfort in writing. I'm  
12 sorry.

13 Q I was listening to what you were saying. You said,  
14 or I believe you said, she noted when you walked down the  
15 hallways. How did you note that she noted that or how did  
16 you know that she noted this?

17 A I have correspondence via email where Dr. Barker  
18 noted if I spoke to another faculty member but not her or if  
19 I spoke to Mr. John Allen but not her.

20 Q Okay. But walking down the hallways, you would be  
21 speaking. Is that what you're referring to?

22 A Uh-huh (yes).

23 Q Other than that, was there any other issues that  
24 you had, other than where you may have been on campus? Now  
25 let me back up a little bit. As the director of academic

1 A There is no tenure.

2 Q Okay. I never knew that answer. So that wasn't  
3 the case here? So every year, I guess, every faculty member  
4 is issued a letter of renewal or non-renewal?

5 A Uh-huh (yes).

6 Q All right. When a letter of non-renewal is issued,  
7 is there always a reason given for the non-renewal or is it a  
8 standard like we have decided not to renew your form, like if  
9 it was for cause, for instance, would you say in particular  
10 why the person was not being renewed?

11 A I have little experience with this. As an at will  
12 state, I don't know the best processes. So I don't know.

13 Q Do you know who makes that final decision?

14 A Dr. Horton.

15 Q Okay. So after Dr. Barker was hired in the Fall of  
16 2017, she was an English professor. Correct?

17 A Yes.

18 Q Who was the English department chair or however  
19 it's--is it just English or is it languages?

20 A It's humanities, and so Dr. Kelly Lankeford was the  
21 chair.

22 Q Okay. And does humanities encompass history and  
23 English and the languages or are the languages separate?

24 A For, I think, two years, the languages sat with the  
25 humanities due to staffing issues in languages. They have

1 Q Yes. That grievance.

2 A Yes.

3 Q And so you went to Ms. Kidd, you went to Dr. Allen,  
4 and then during the investigation, you went to Dr. Barker--  
5 excuse me, Dr. Horton?

6 A Yes.

7 Q Okay. And you remained the-- Excuse me. As  
8 director of academic affairs, do you approve request for  
9 leave?

10 A At times during my tenure, that has been the  
11 process.

12 Q What's the process right now?

13 A Department chairs approve faculty leave and I  
14 approve department chairs, with the exception of faculty who  
15 may be married to their chair, in which case, I approve their  
16 leave.

17 Q Okay. Are there any faculty members who currently  
18 are married to each other?

19 A Yes.

20 Q And who are those faculty members?

21 A Dr. Allen, Ms. Lisa Benner. Dr. Casey Green and  
22 her husband, Dr. Christopher Bouton. My husband, Randy Key,  
23 is a mathematician at LSMSA. I think that's it on the  
24 faculty.

25 Q So for instance, your husband, who would approve

1 the concern with the size of the binder as it concerned the  
2 investigation, let's talk about those communications and the  
3 actions that led to Dr. Barker's complaint. We won't go over  
4 all of those today because those will just be attached for  
5 the court to consider, but you communicated quite frequently  
6 with Dr. Barker, didn't you?

7 A I tried to. I'm sorry, did you say frequently?

8 Q I said you communicated with her frequently, didn't  
9 you?

10 A Frequently? Yes. I heard frankly. I apologize.  
11 Yes.

12 Q Did you communicate with her on text message?

13 A I did.

14 Q Did you communicate with her on email?

15 A I did.

16 Q Did you communicate with her on phone  
17 communication?

18 A Did we have phone calls?

19 Q Yes.

20 A Yes.

21 Q Did you communicate with her on Instagram?

22 A I did.

23 Q Did you communicate with her on Facebook?

24 A I did.

25 Q Did you communicate with her on any other platform,

1 activities, with other faculty members?

2 A I have. Yes.

3 Q And who, what are their names?

4 A I've had lunch outside of work with Kelly  
5 Lankeford. I have socialized outside of work with Dr. Jason  
6 Anderson. I attend church with Ms. Crystal Lewis. I have  
7 been to, you know, the--the Christmas parade or the  
8 homecoming parade downtown, I might see six or eight people I  
9 work with and maybe we stop and talk, maybe we spend time  
10 together, maybe it's a wave and a pass, I'm not sure. One of  
11 the movies I attended with Dr. Barker, Dr. John Allen and a  
12 guest of his was in attendance. But as we know, Natchitoches  
13 is small and a single movie theater. We often find other  
14 folks in there that we know. So have I answered your  
15 question?

16 Q You did. Was there ever a time that you had  
17 invited Dr. Barker to Toledo Bend?

18 A I did.

19 Q Tell us about that.

20 A Some family friends of ours have a camp at Toledo  
21 Bend. I've known the Atkins for nearly thirty years. Their  
22 daughter, Caroline, was a current student at LSMSA at the  
23 time and was in Dr. Barker's English elective, I think.  
24 Caroline's father, Philip, had met Dr. Barker and had met  
25 Ms. Jenny Schmidt at previous LSMSA events, I believe, and

1 go see the 8:00 p.m. showing on Saturday, or whatever it was.

2 Q Was it ever referred to as a double date?

3 A Yes. I made a joke and said potential double date.

4 Q Another joke about a potential double date with a  
5 faculty member at the time, Dr. Barker. Correct?

6 A Yes.

7 Q Do you know when this would've occurred, in terms  
8 of the time line?

9 A I think in--early in 2018, I think, in the Winter,  
10 like--like January of February of '18, I think.

11 Q And was this the only time you went to the movies  
12 with Dr. Barker?

13 A I believe she joined my daughter and I for A  
14 Wrinkle In Time. Andrew Neeman--

15 Q I'm sorry to cut you-- What's A Wrinkle In Time?

16 A A film.

17 Q The film?

18 A Uh-huh (yes). The film. Andrew Neeman was also  
19 there from the school. It was just happenstance.

20 Q You testified you had a daughter. How many  
21 children do you have?

22 A I have two daughters.

23 Q Okay. I'm assuming they lived with you in  
24 Natchitoches during this time as well?

25 A Uh-huh (yes). Yes.



1 Q And your husband also lives with you?

2 A Yes.

3 Q Does any other individual live with you?

4 A My mother.

5 Q Okay. Has she lived with you during this entire  
6 time period?

7 A Yes.

8 Q Okay. So obviously, it seems like, from my  
9 perspective, that you and Dr. Barker were friends and  
10 friendly. When did, from your perspective, this change?

11 A In May of 2018, Dr. Kelly Lankeford asked for a  
12 meeting, and in that meeting, she shared with me that she was  
13 concerned about how Dr. Barker was representing our  
14 friendship to other faculty members, and her concerns seemed  
15 to be centered on Dr. Barker's claims of access to  
16 administration, access to administrative conversations and  
17 administrative concerns, and Dr. Lankeford expressed in that  
18 meeting that she was not comfortable with how Dr. Barker was  
19 representing things. To your question, for me, this was the  
20 beginning of my personal concerns about Dr. Barker and  
21 whether our friendship could be maintained.

22 Q When you say she, Dr. Barker, had access to  
23 administrative--or that was the allegation, that she had  
24 access to administrative decisions or thought processes or  
25 things like that, let's walk through that. During your